

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

LESTER LEE,
Plaintiff, Pro Se

v. **Case No. 8:24-cv-01205-ABA**

BROOKSIDE PARK CONDOMINIUM, INC.,
METROPOLIS (MCM, INC.),
RAMMY AZOULAY, and
LAMONT SAVOY,
Defendants.

**EMERGENCY MOTION TO STAY ENTRY OF JUDGMENT PENDING
SUBMISSION OF RULE 60(b) MOTION**

Plaintiff respectfully moves this Court on an emergency basis to stay entry of judgment in the above-captioned matter pending the forthcoming submission of a motion under Rule 60(b) of the Federal Rules of Civil Procedure. Good cause exists to grant this motion for the following reasons:

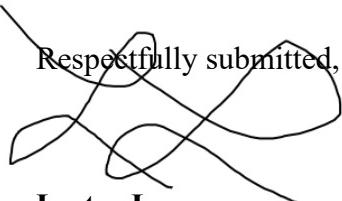
1. The Court has issued an oral ruling granting summary judgment in favor of Defendants. However, no final judgment has yet been entered on the docket.
2. Plaintiff has filed a motion requesting the official transcript of the recent hearing and cannot properly frame or finalize the Rule 60(b) motion until the transcript is

available. Without access to the record, Plaintiff is unable to fully address or challenge factual findings made during the hearing.

3. Plaintiff also filed a Motion for Leave to File Surreply ("SUR motion") on the day of the hearing, which remains pending and unresolved. This motion raises material objections to arguments raised in Defendants' reply brief and directly affects the summary judgment posture.
4. Plaintiff has newly discovered evidence, material contradictions in Defendant testimony, and verified agency findings that directly undermine several factual assumptions that formed the basis for the Court's ruling.
5. Plaintiff also intends to challenge the application of legal authority relied upon by the Court, including the improper reliance on *Scroggins v. Housing Authority*, which is not controlling and was misapplied factually and procedurally in this case.
6. In addition, Plaintiff seeks to present evidence of misconduct, fraud on the court, discovery abuse, and post-briefing conduct by Defendants that severely prejudiced Plaintiff's ability to be heard on the merits.
7. Because entry of judgment will begin the timeline for appeal and restrict this Court's ability to revise its ruling, a brief stay is necessary to preserve the Court's jurisdiction and provide an opportunity to consider the forthcoming Rule 60(b) motion and supporting exhibits.
8. The requested stay will not prejudice Defendants, who have not yet moved to enforce or execute any judgment, and will serve the interest of justice by ensuring that no judgment is entered based on incomplete or misleading representations.

9. Plaintiff's Rule 60(b) motion will be filed within days and will include agency documents, deposition excerpts, and verified contradictions that raise serious doubt about the factual findings at issue.

WHEREFORE, Plaintiff respectfully requests that this Court issue an immediate order staying entry of judgment until such time as (1) the hearing transcript is available, (2) the SUR motion has been ruled upon, and (3) the Court has considered Plaintiff's forthcoming Rule 60(b) motion and supporting materials.


Respectfully submitted,

Lester Lee

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